

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, Michael  
Shum, Katie Nelson, Tannen Maury,  
Stephen Maturen, and The  
Communications Workers of America,  
*On behalf of themselves and other similarly  
situated individuals,*

Plaintiff,

vs.

City of Minneapolis; Minneapolis Chief  
of Police Medaria Arradondo *in his  
individual and official capacity*;  
Minneapolis Police Lieutenant Robert  
Kroll, *in his individual and official  
capacity*; Minnesota Department of  
Public Safety Commissioner John  
Harrington, *in his individual and official  
capacity*; Minnesota State Patrol Colonel  
Matthew Langer, *in his individual and  
official capacity*; and John Does 1-10, *in  
their individual and official capacities*.

Defendants.

Court File No. 20-cv-01302  
(WMW/DTS)

**DEFENDANT MINNEAPOLIS  
POLICE LIEUTENANT ROBERT  
KROLL'S MOTION TO DISMISS  
PURSUANT TO RULE 12(B)(6)**

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**TO: THE COURT ADMINISTRATOR AND ALL COUNSEL OF RECORD**

**MOTION**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant Minneapolis Police Lieutenant Robert Kroll hereby moves the United States District Court, District of Minnesota for an Order to dismiss Plaintiff's Second Amended Complaint for failure to state a claim upon

which relief can be granted. Said Motion is based upon the attached Memorandum of Law and all of the files, records, and proceedings herein.

Respectfully submitted,

**KELLY & LEMMONS, P.A.**

Dated: September 14, 2020

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